

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN**

In the Matter of:

Brandon Heitmann

Debtor

Case No. 24-41956

Chapter 13

Hon. Mark Randon

ALEX BOYD and
REBECCA BOYD

Plaintiffs,

Adv. No. 24-04125-mar

Hon. Mark Randon

State Court Case No. 23-003864-CZ

vs.

BRANDON HEITMANN, AMANDA PISARSKI, KODY
GRANDCHAMP, HENRY GIRARD BELL,
CONSTRUCTION CONTRACTORS, LLC, and
EXPLORE INDUSTRIES USA, INC.,
Defendants.

**AMANDA PISARSKI'S OBJECTION TO MOTION FOR REMAND
AND FOR ABSTENTION**

Defendant Amanda Pisarski concurs with, and relies upon, Debtor's
Objections to *Boyd*¹, *Carter*², and *Bell*'s Motions for Remand.

Defendant Pisarski further states, that upon information and belief,
Defendant Explore Industries USA, Inc., also objects to the Motions for Remand.

The *Boyd* and *Carter* Motions make numerous incorrect claims that the
actions against the remaining non-debtor defendants are attenuated from the

¹ *Boyd v Exigent, et. al.*, Macomb County Circuit Court Case No. 23-003864-CZ

² *Carter v Exigent, et. al.*, Macomb County Circuit Court No. 23-003865-CZ

pending proceedings. This is patently false, as described in Debtor's Objection. It should be noted, the *Boyd* and *Carter* Motions for Remand list various factors the Court must consider in determining whether or not a matter should remain in Bankruptcy Court (factors relating to assessment of core-proceedings and abstention). Tellingly, the *Boyd* and *Carter* Motions are devoid of any analyses of these factors. The Motions simply concluded "*all these factors*" weigh in favor of remand.

WHEREFORE, this Court should deny the Motions to Remand and for Abstention, and grant Defendant Pisarski such further relief as this Court deems just.

Respectfully submitted,

KOTZ SANGSTER WYSOCKI P.C.

/s/Tyler P. Phillips

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Dated: August 9, 2024

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_____ /

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CERTIFICATE OF SERVICE

I, Tyler P. Phillips, hereby certify that on the 9th day of August, 2024, I caused to be served Amanda Pisarski's Objection to Motion for Remand and for Abstention by: (1) the Electronic Case Filing System for the United States Bankruptcy Court for the Eastern District of Michigan; and (2) US mail, to the parties on the attached service list.

/s/Tyler P. Phillips

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Case 24-04125-mar
Eastern District of Michigan
Detroit
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